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BELLSOUTH

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Vice President-
Federal Regulatory

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July 13, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

RECEIVED
JUL 13 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: Ex Parte Presentation in WT Docket No. 99-217 and CC Docket No. 96-98

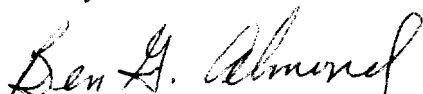
Dear Ms. Salas:

On July 12, 2000 representatives of Verizon Communications, SBC Communications, Inc. and BellSouth Corporation met with members of the Wireless Telecommunications Bureau concerning issues related to the above-mentioned proceedings. In addition, the representatives met in separate meetings with each of the legal advisors for the Chairman and respective Commissioners.

The attached documents were used for discussion purposes in each of the meetings. Please associate this notification and accompanying materials with the referenced docket proceedings. Attached is the list of participants in the meetings.

If there are any questions concerning this matter, please contact the undersigned.

Sincerely,



Ben G. Almond
Vice President-Federal Regulatory

Attachments

cc:	Jim Schlichting	Adam Krinsky
	Jeffrey Steinberg	Mark Schneider
	Leon Jackler	Peter Tenhula
	Joel Taubenblatt	Helgi Walker
		Clint Odum

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List A B C D E

July 13, 2000

July 12, 2000 Ex Parte – WT Docket No. 99-217 and CC Docket No. 96-98

Industry Participants:

Verizon Communications, Inc.

Joe Mulieri

SBC

Jared Craighead

BellSouth

Keith Milner

Ben Almond

FCC Participants:

WTB

Jim Schlichting

Jeffrey Steinberg

Joel Tanbenblatt

Leon Jackler

Legal Advisors

Adam Krinsky

Commissioner Tristani's office

Mark Schneider

Commissioner Ness's office

Peter Tenhula

Commissioner Powell's office

Helgi Walker

Commissioner Furchtgott-Roth's office

Clint Odum

Chairman Kennard's office

July 12, 2000

BellSouth Ex Parte

CC Docket No. 96-98

WT Docket No. 99-217

ACCESS TO MTE PROPERTIES

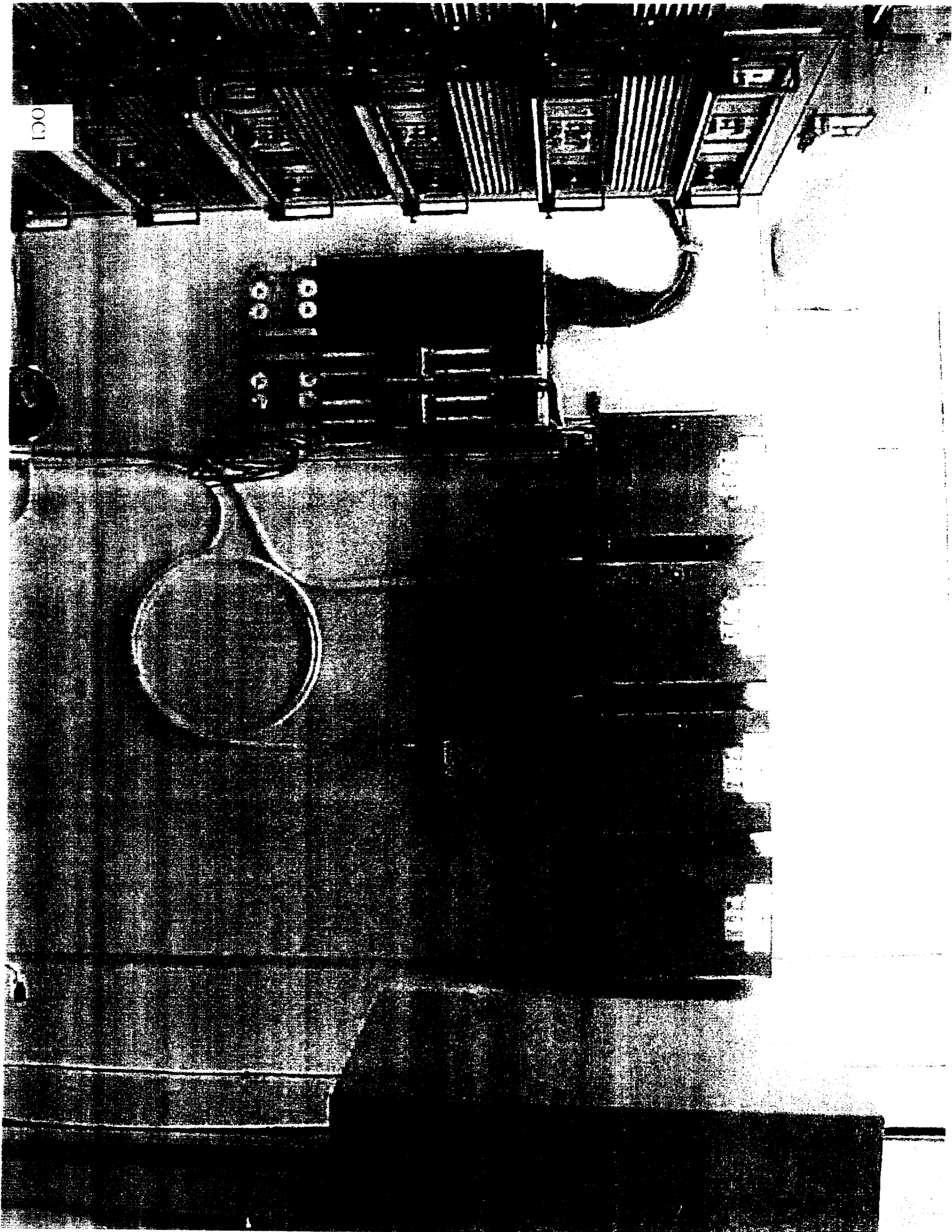
- *Record shows no evidence that owners are pervasively denying access.*
- *Mandatory access rule would lead to protracted litigation.*
- *FCC has authority to regulate communications providers.*
- *Most effective way to ensure competitive access is to require:*
 - *all communications providers to give access to in-building wire they own or control,*
 - *in a fair and reasonable manner,*
 - *where technically feasible.*
- *FCC should encourage property owners to install infrastructure (conduit, backboards and other support structures) in such a way that facilitates service provisioning from multiple carriers.*
- *Non-value-added “gatekeeper” access fees should be prohibited.*

DEMARCATIION POINT ISSUES

- *Location of demarcation point does not affect whether competitors receive access at a Single Point of Interconnection (SPOI).*
- *Current Part 68.3 rule should be retained.*
 - *Provides flexibility needed by owners and carriers.*
 - *Forced moves of existing demarcation points could lead to service disruptions, inefficient networks and high costs.*
- *The more access paths to end user, the better.*
 - *Subject to physical constraints of building infrastructure.*
 - *UNEs will provide carriers access to end customers even when building infrastructure (conduit, backboards and other support structures) is at exhaust.*
- *Forced MPOE will chill deployment of new technologies and may require unnecessary, expensive and confusing retraining.*

EXCLUSIVE CONTRACTS

- ***Exclusivity, whether “facilities” or “service” is not consistent with the goals of the Telecom Act of 1996.***
- ***Commission should adopt a rebuttable presumption that service providers cannot initiate or enter into such contracts***
 - ***at least for X time period;***
 - ***after which the Commission may revisit this prohibition.***



KEY TO PHOTOS

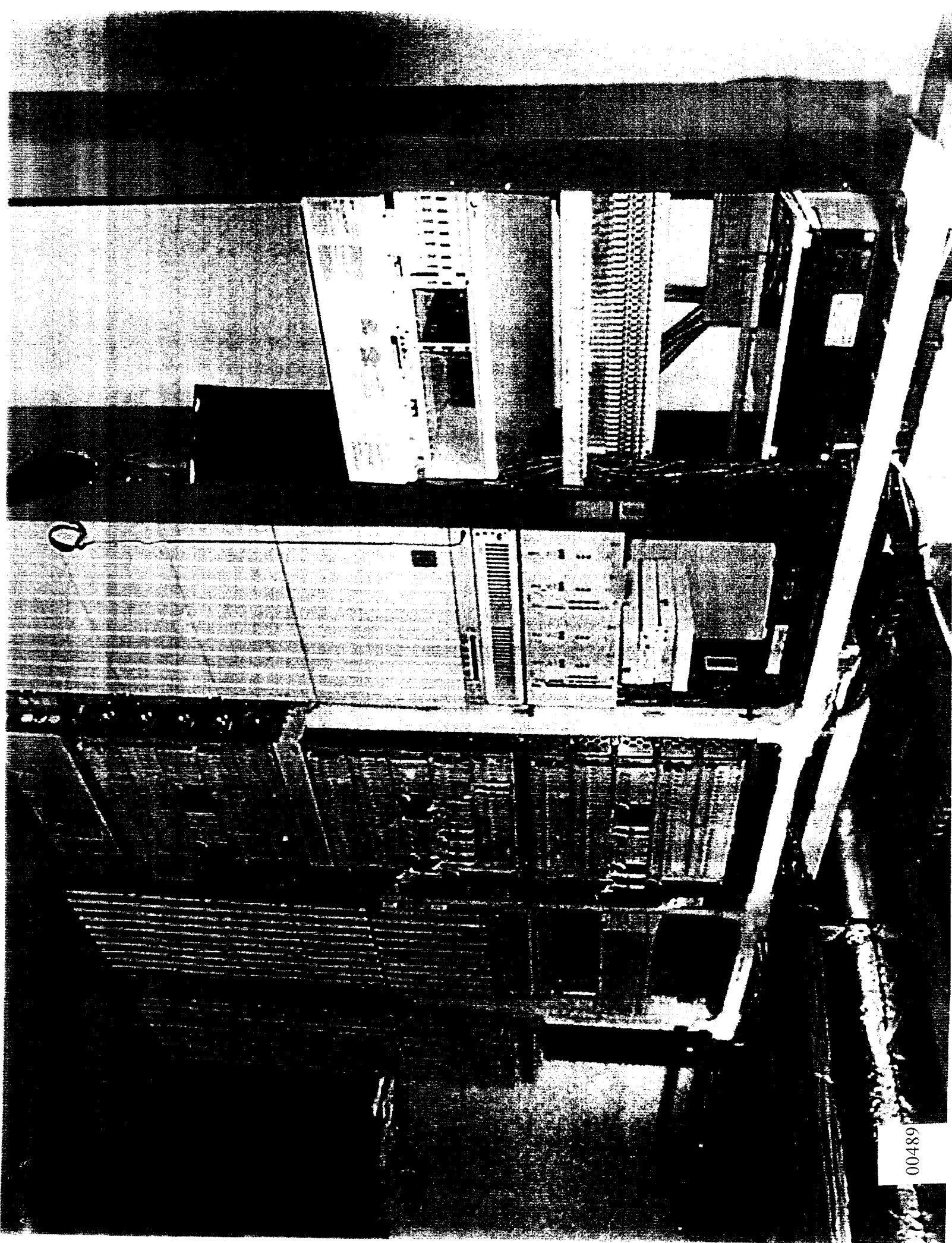
FILE

DESIGNATION

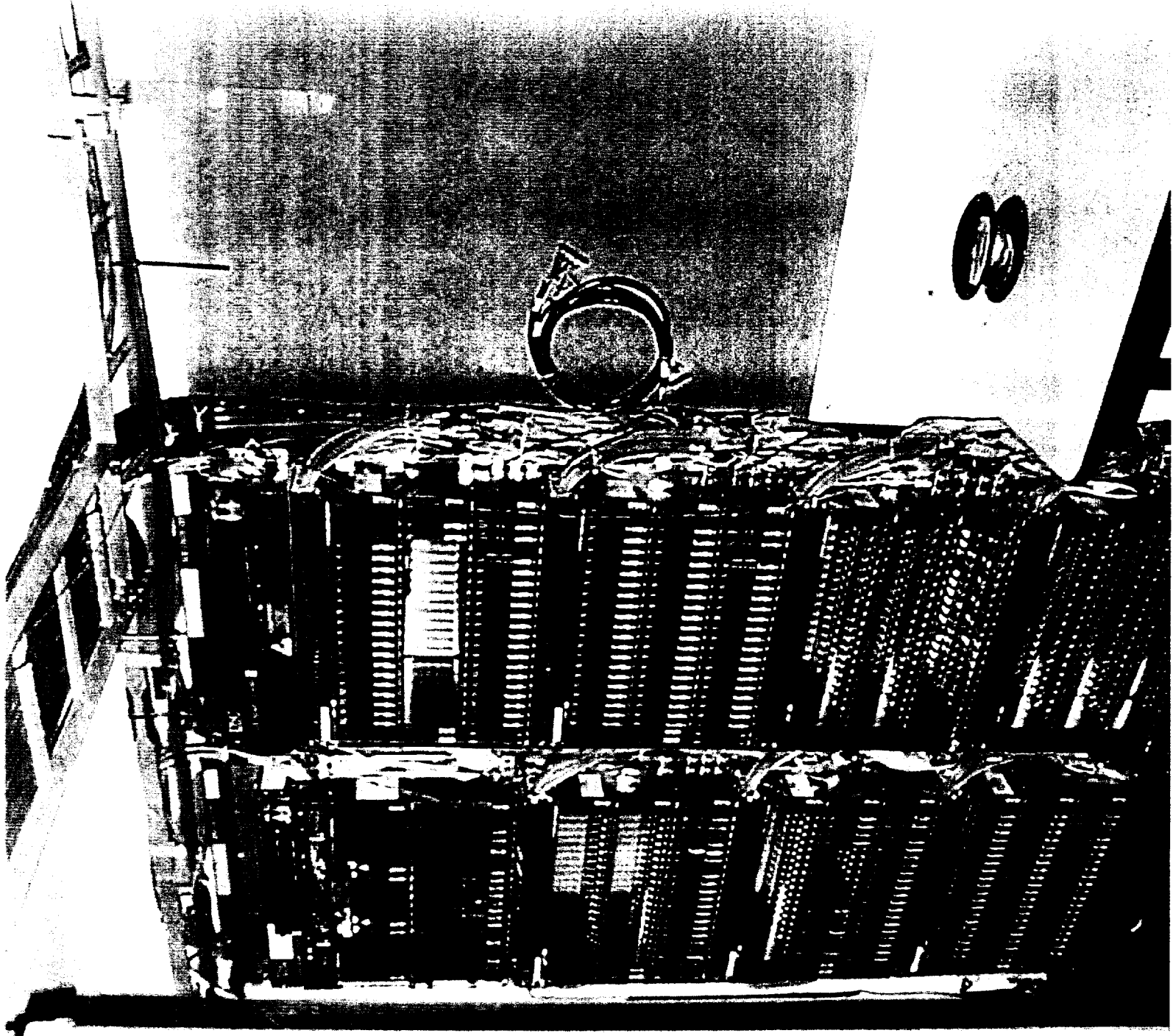
SCENARIO DEPICTED

OC1.....(*Name/location of building deleted*) Fiber In The Loop (FITL) equipment located on 1st and 19th floors of residential highrise building. FITL equipment installed at upper floors to accommodate building owner's space availability and to minimize wire length from electronics to end users; i.e., due to transmission distance limitations of copper wire. Equipment on 19th floor cannot be moved to MPOE inside of the building due to lack of space. (All available space on 1st floor already used by other FITL equipment.)

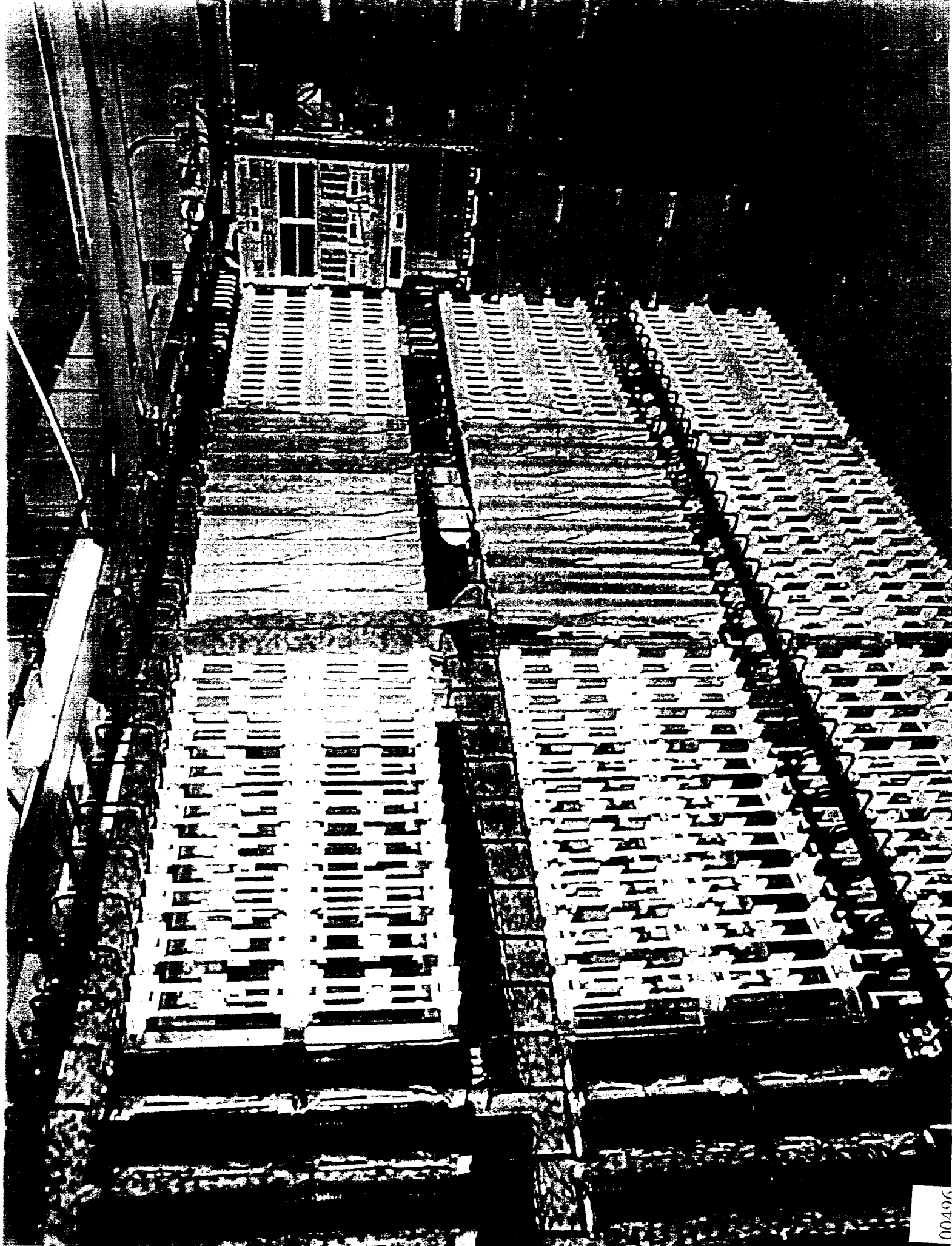
Move of all equipment to property line MPOE would require installation of outside remote terminal enclosures and re-cabling of the building. Estimated cost of labor and materials is \$150,000. Even assuming owner would permit such a move, it could not be accommodated without the installation of a totally redundant system and subsequent removal of the existing system. This cost does not include the cost of additional conduit that the owner would provide.

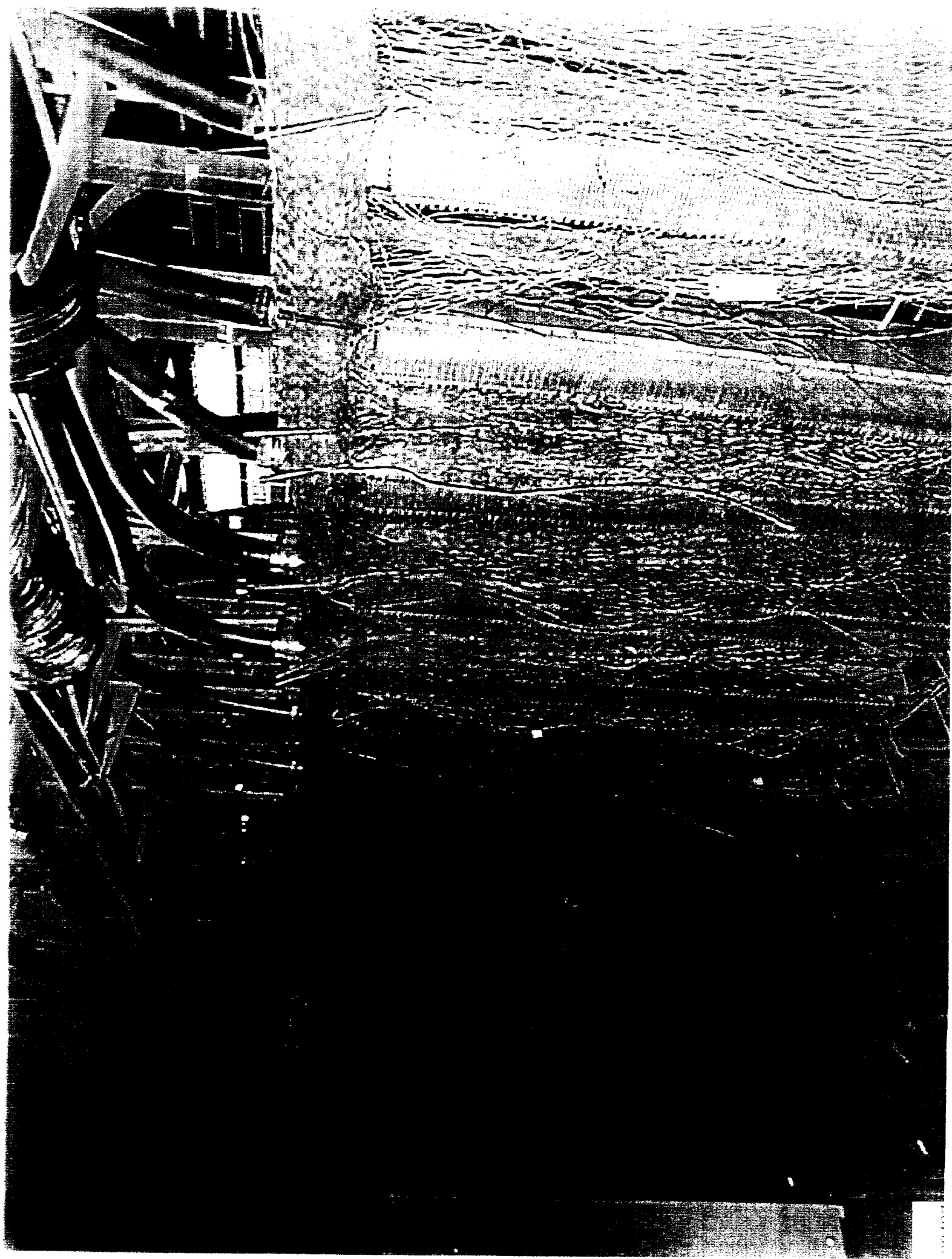


00489



00495





KEY TO PHOTOS

FILE DESIGNATION

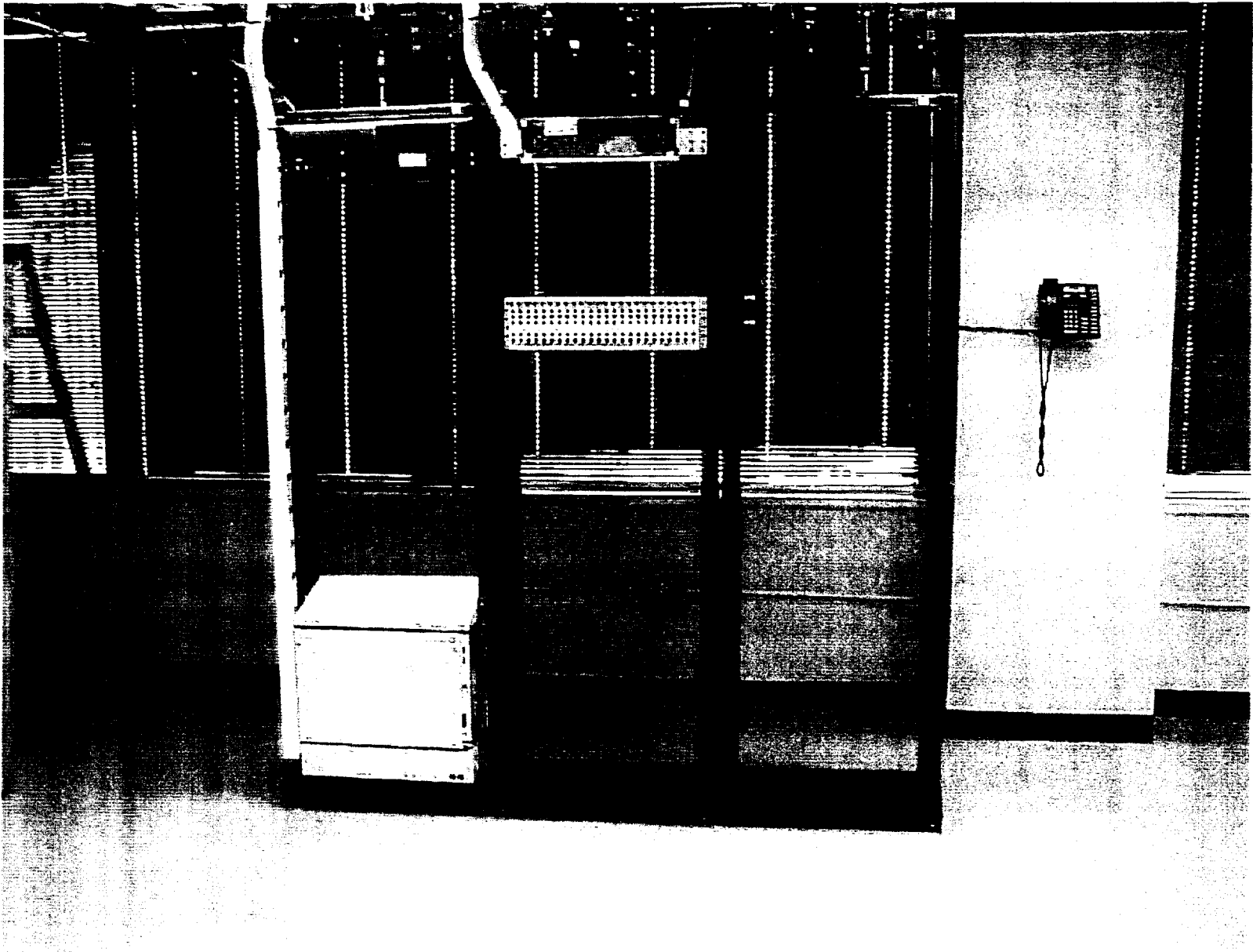
SCENARIO DEPICTED

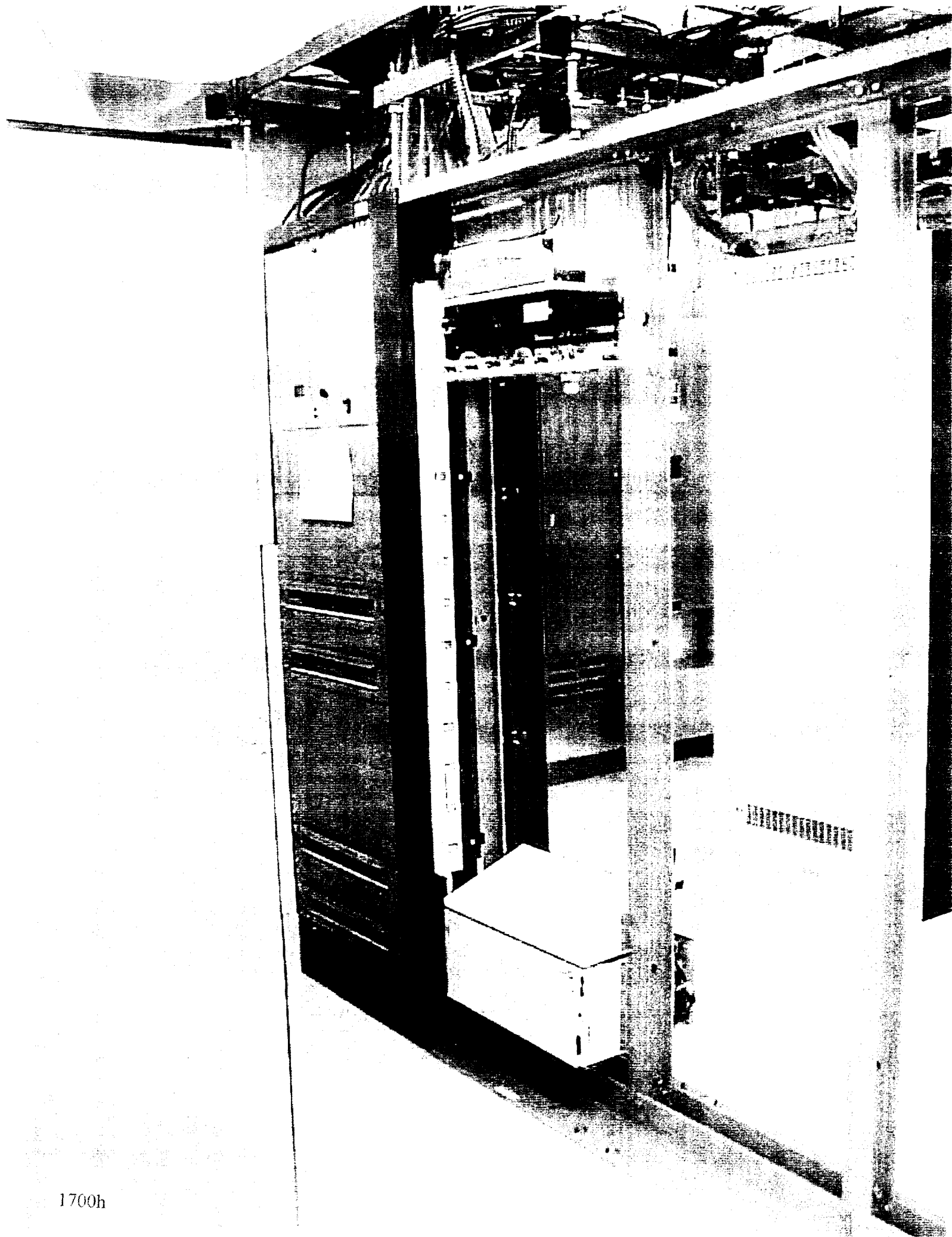
00489.....(*Name/location of building deleted*) This equipment room is on the 40th floor of a building serving multiple governmental agencies. Shown are fiber optic-fed multiplexers, digital loop carrier channel banks, alarm panels, T1 repeaters, lightguide and digital cross-connect panels.

00495/00496.....Same building. These two photos depict the equipment room located on the 16th floor. It houses additional digital loop carrier equipment and cross-connect facilities.

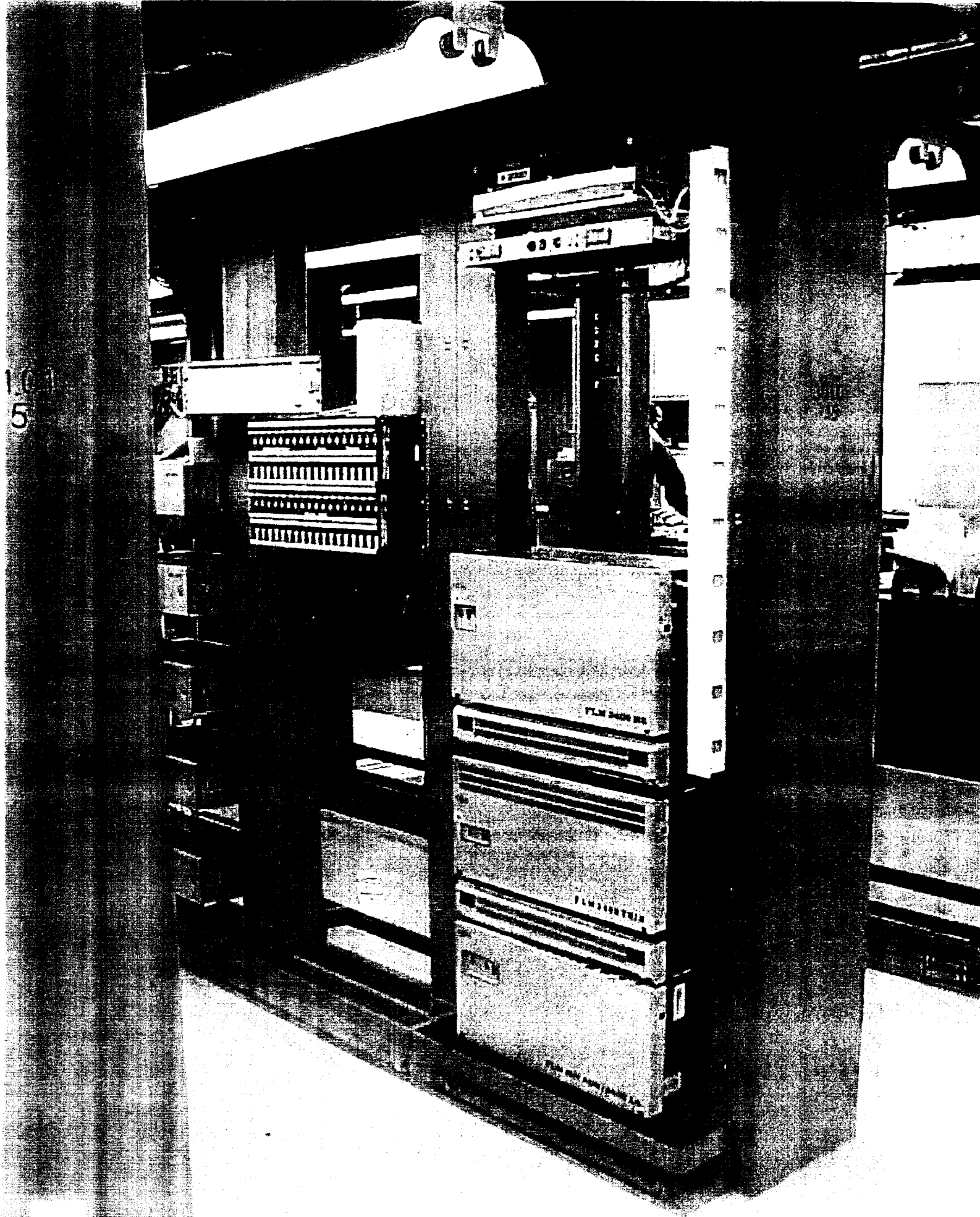
00497.....Same building, main entrance facility room in the basement housing lightning protectors for copper cable entrances and main riser cable cross-connects.

There is no room in the basement of this building to house the 40th and 16th floor equipment, however, if there was, the estimated labor and material cost to effect a move to MPOE is \$430,000. This cost includes recabling the building which would be required to accommodate the new electronics location. It should be noted that, in any case, the occupants of this building would not tolerate the disruption of such a move.

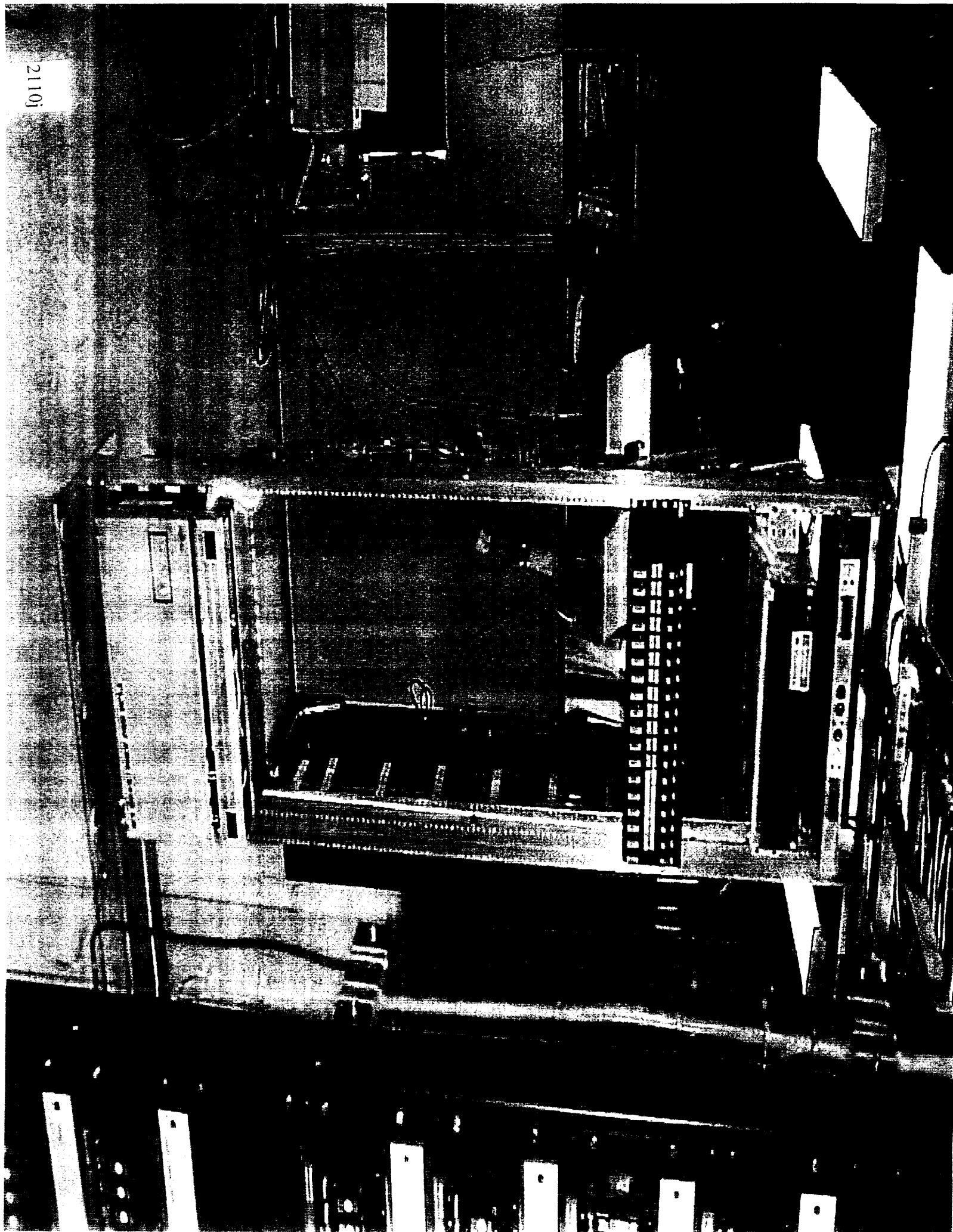




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KEY TO PHOTOS

FILE DESIGNATION

SCENARIO DEPICTED

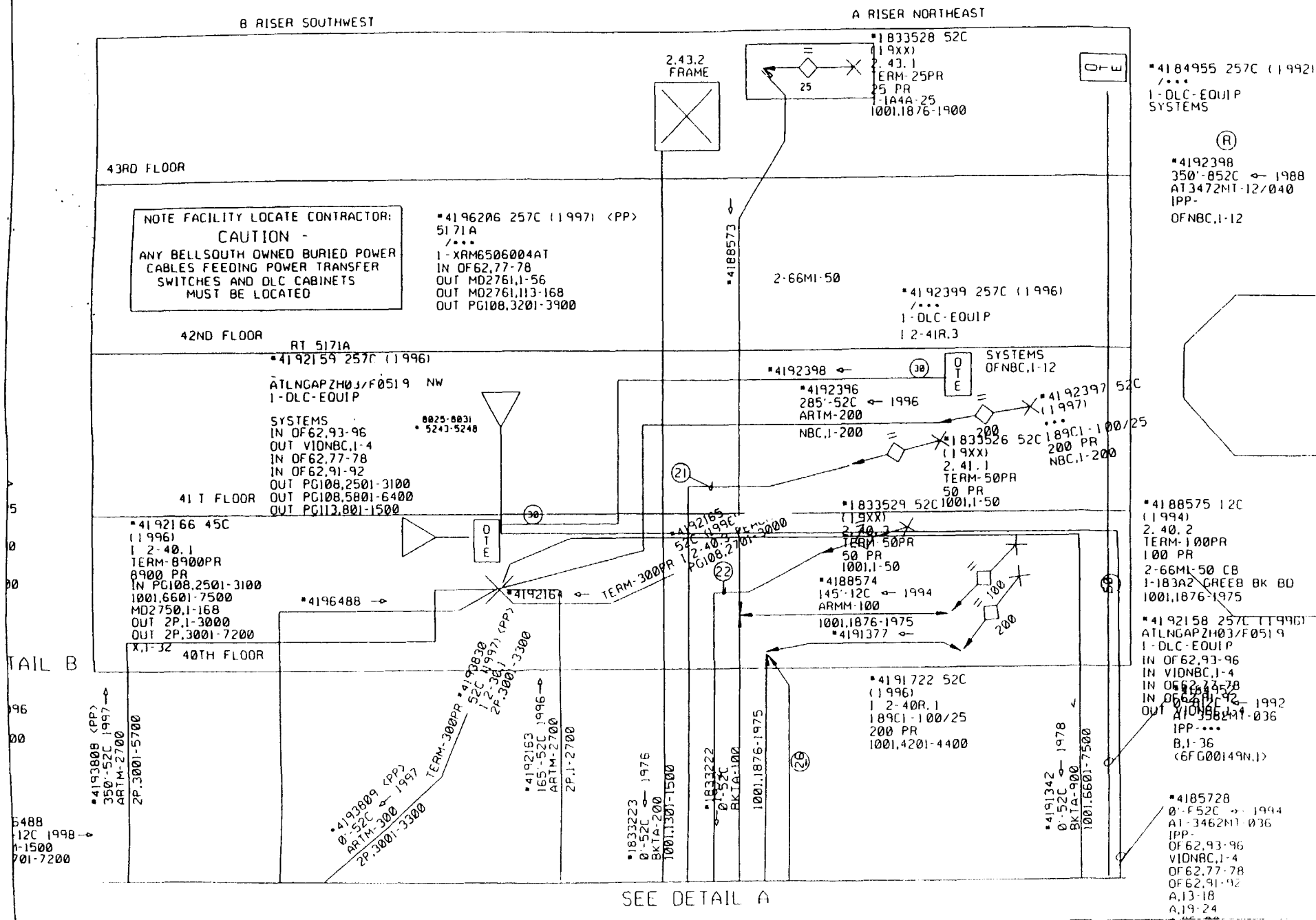
1500d	<i>(Name/location deleted)</i> Suite 1500 (15 floor) DDM-2000 multiplexer (OC12), Fiber Terminal, Fuse & Alarm Panel, DSX3 digital cross-connect
1700h.	<i>Name/location deleted</i> Suite 1700 (17th floor) DDM-2000 mux. (OC3), Fiber Terminal, Fuse/Alarms, Digital cross-connect
1900b	<i>Name/location deleted</i> Suite 1900 (19th floor) FLM-600 mux (OC12) and FLM-2400 mux (OC48), Fiber Terminal, Fuse & Alarm Panel, digital cross-connect DSX3
2110j	<i>Name/location deleted</i> Suite 2110 (21st floor) FLM-600 mux (OC12), Fiber Terminal, Fuse & Alarm Panel, digital cross-connect DSX3

SUMMARY

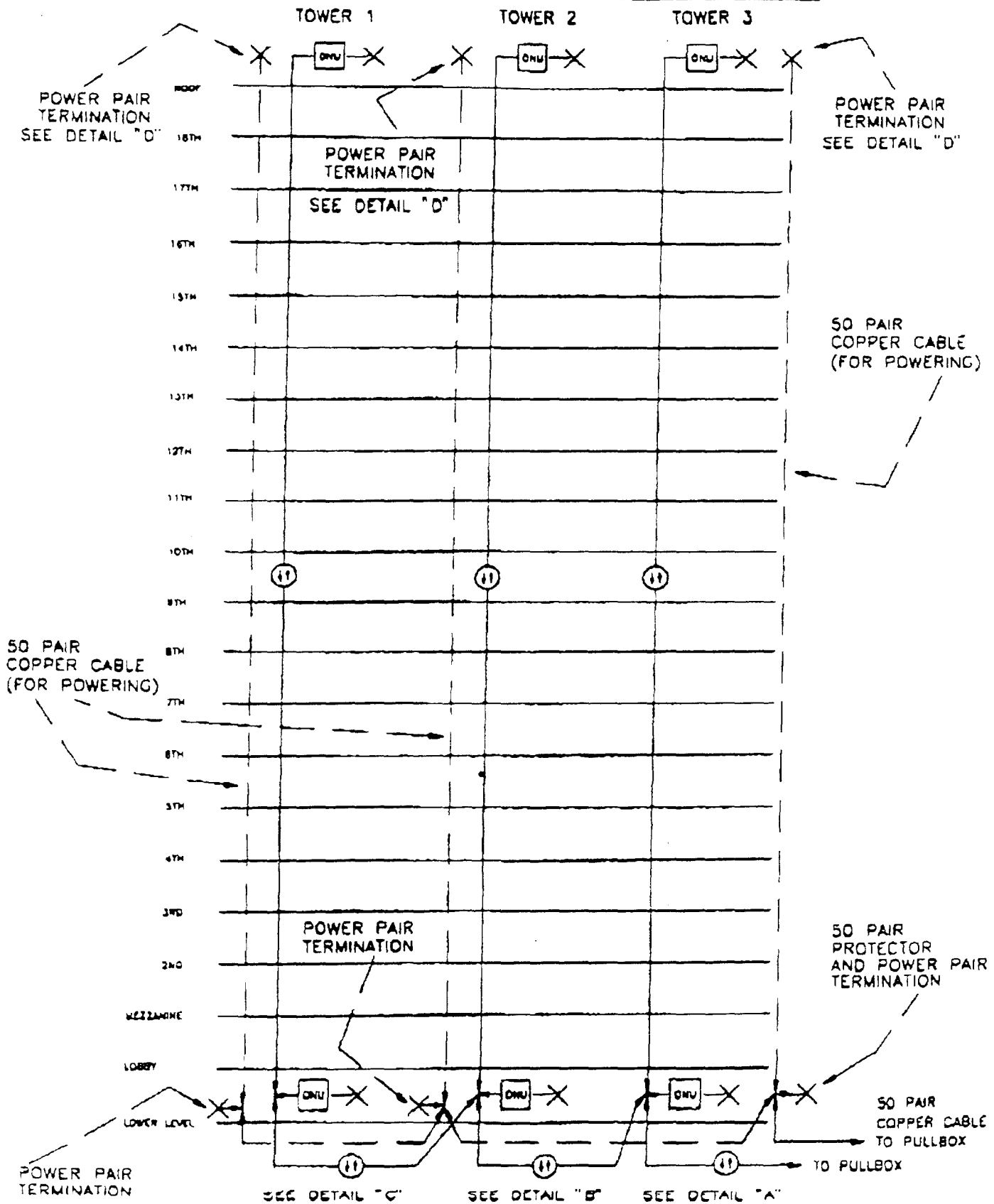
Name/location of building deleted is an example of a "Carrier Hotel"; that is, a building which is occupied primarily by various providers of communications services. These pictures depict just four of the floors in this highrise. These customers typically demand that BellSouth's fiber optic cables be routed directly to their premises and that the serving multiplexers and digital loop carrier equipment be located in their own equipment rooms. Such carriers seek out buildings located in areas where BellSouth has known fiber-optic deployment and where the building owner will provide adequate riser conduits to accommodate their unique requirements.

Due to the sheer amount of equipment that such carriers require, in addition to their demand for utmost security, it would not be possible to locate all serving equipment at the MPOE. Although moving such equipment to MPOE is simply not possible, the cost to do so would be in the millions of dollars.

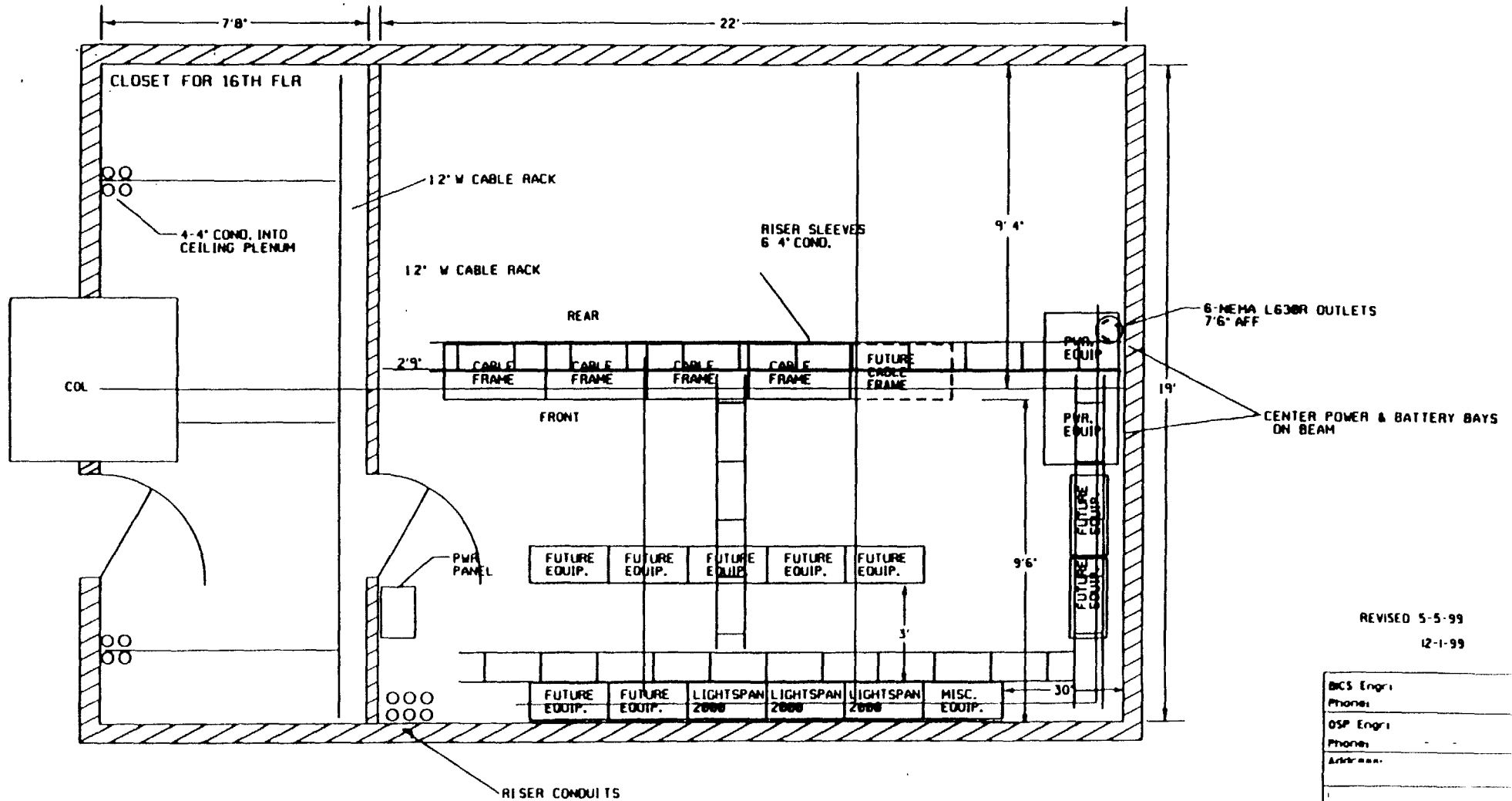
Such "Carrier Hotels" are excellent examples of why owners and end users must have the flexibility to designate a demarcation point that best suits their individual requirements.



CABLE RISER SCHEMATIC



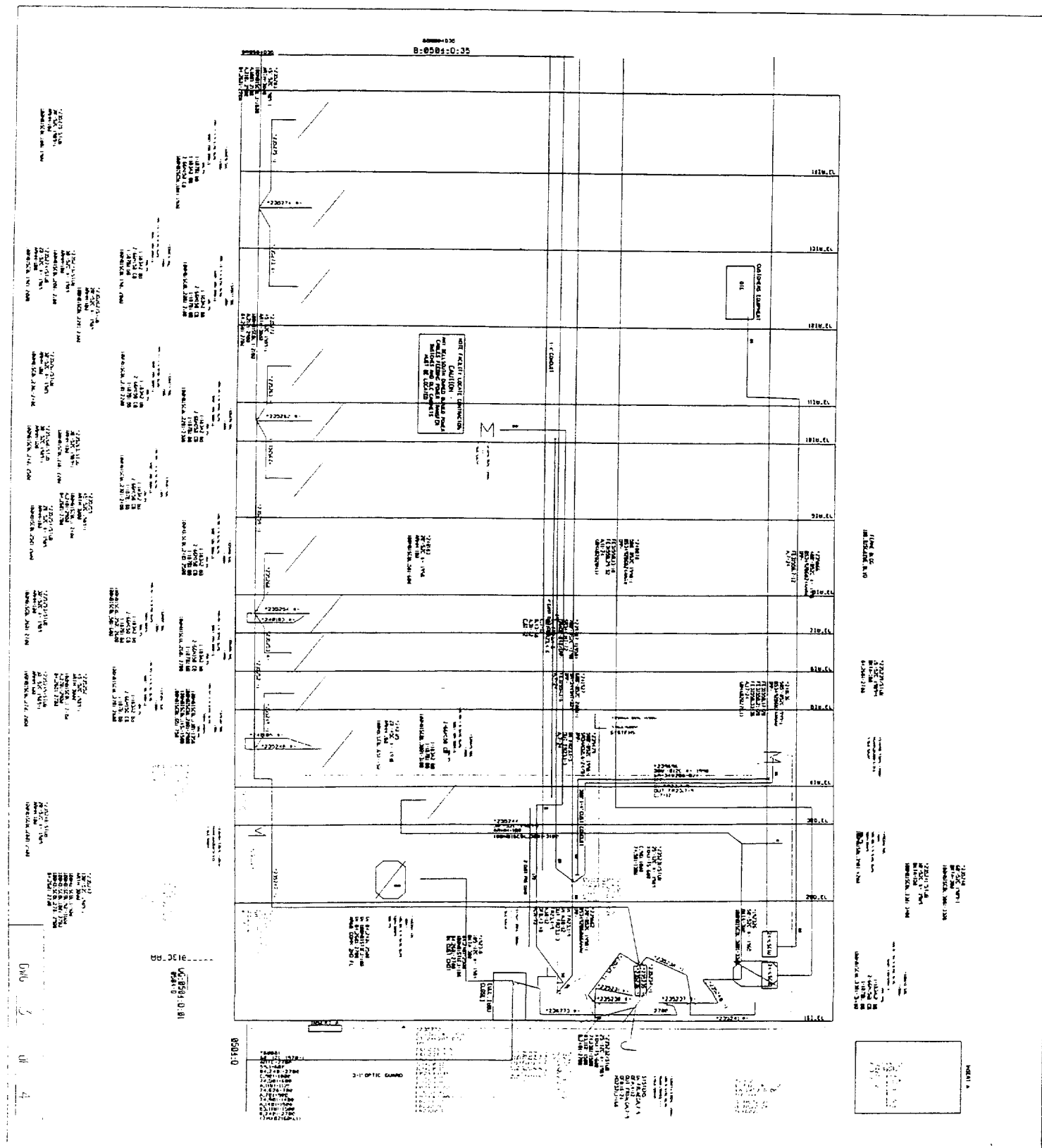
DETAIL NEW 16 FLOOR ELECTRONICS ROOM



REVISED 5-5-99

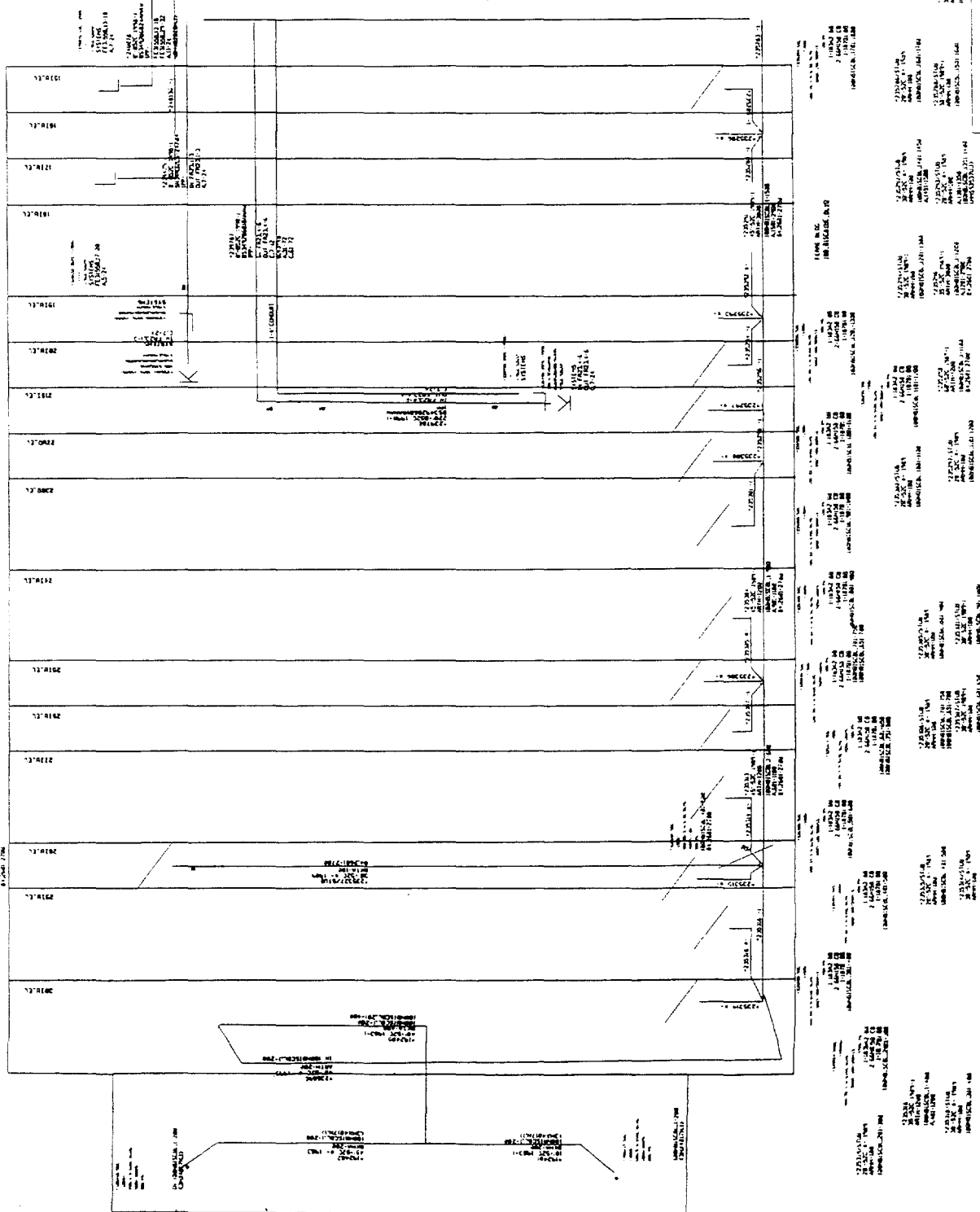
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BCS Engr:
Phone:
OSP Engr:
Phone:
Address:
BCS No. AR0239
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